

WMN:KKO/EW
F. #2010R02094/OCDETF #NY-NYE-664

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

STEVEN PUNTURIERI,
LOUIS D'ARPA,
NADER ALLAN,
also known as "Ned,"
JOSEPH CHEE,
JOHN KELLY,
DAMIEN MARRERO,
IAN MCDANIEL,
ANGELIQUE SESTITO,
DANIELLE WOLF and
JAMES WRENN,

Cr. No. _____
(T. 21, U.S.C.,
§§ 841(b)(1)(C), 846,
853(a) and 853(p);
T. 18, U.S.C.,
§§ 3551 et seq.)

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

CONSPIRACY TO DISTRIBUTE OXYCODONE

1. On or about and between January 1, 2010 and June 20, 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants STEVEN PUNTURIERI, LOUIS D'ARPA, NADER ALLAN, also known as "Ned," JOSEPH CHEE, JOHN KELLY, DAMIEN MARRERO, IAN MCDANIEL, ANGELIQUE SESTITO, DANIELLE WOLF and JAMES WRENN, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing oxycodone, a Schedule II

controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendants that, upon their conviction of the offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value;

or

(e) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of such defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL

FOREPERSON

LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

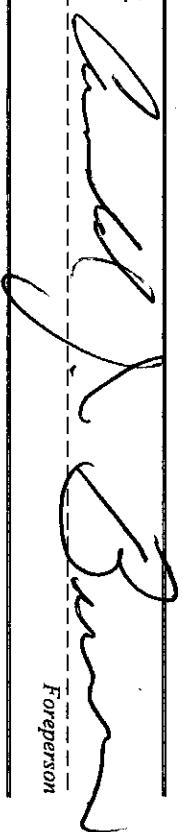
*Steven Punturieri, Louis D'arpa, Nader Allan, also known as "Ned,"
Joseph Chee, John Kelly, Damien Marrero, Ian McDaniel, Angelique
Sestito, Danielle Wolf and James Wrem,*

Defendants.

INDICTMENT

(T. 21, U.S.C., §§ 841(b)(1)(C) and 846, 853(a), 853(p);
T. 18, U.S.C., §§ 3551 et seq.)

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____